

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

Richard N. Bell,)	
Plaintiff,)	
)	Case No. 1:13-cv-0798-TWP-DKL
v.)	
)	The Honorable Tonya Walton Pratt
Cameron Taylor,)	Magistrate Denise K. LaRue
Taylor Computer Solutions,)	
Fred O'Brien,)	
Insurance Concepts,)	
Shanna Cheatham,)	
Defendants.)	

OFFER OF JUDGMENT

TO: Richard N. Bell
10042 Springstone Road
McCordsville, Indiana 46055
richbell@comcast.net

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Cameron Taylor d/b/a/ Taylor Computer Solutions ("Taylor"), Fred O'Brien d/b/a/ Insurance Concepts ("O'Brien"), and Shanna Cheatham ("Cheatham")(collectively referred to as the "Taylor Defendants"), hereby offers to allow Judgment to be entered against them in this action in the total amount of nine hundred dollars (\$900.00)(i.e. \$300 per each of the three individual defendants), including all of Plaintiff's claims for relief against said Taylor Defendants. This offer of judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and is not to be construed as either an admission that the Taylor Defendants, individually or collectively, is liable in this action, or that Plaintiff, Richard N. Bell, has suffered any damage. This Offer of Judgment shall not be filed with the Court unless (a) accepted; or (b) in a proceeding to determine costs.

Respectfully submitted,

DATE: July 11, 2013


John W. Nelson, Attorney No. 22228-49

Law Office of John Nelson

P. O. Box 143, Carmel, Indiana 46082

Phone: (317) 437-4607

Attorney for Defendants Cameron Taylor,
Taylor Computer Solutions, Fred O'Brien,
Insurance Concepts, and Shanna Cheatham

DESIGNATION OF ACCEPTANCE / REJECTION (check all that apply):

1. ☐ Plaintiff ACCEPTS offer as to ALL Taylor Defendants (\$900);
2. ☐ Plaintiff ACCEPTS offer as to Defendant Cameron Taylor (\$300);
3. ☐ Plaintiff ACCEPTS offer as to Defendant Fred O'Brien (\$300);
4. ☐ Plaintiff ACCEPTS offer as to Defendant Shanna Cheatham (\$300);
5. ☐ Plaintiff REJECTS offer as to Defendant: Taylor / O'Brien/ Cheatham
(circle as applicable);
6. ☐ Plaintiff REJECTS offer as to all Taylor Defendants;

BY: _____
Richard N. Bell, Plaintiff

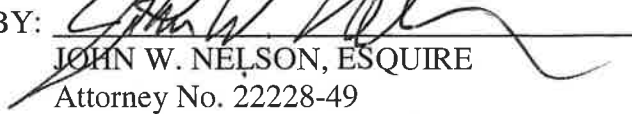
DATED: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 11, 2013, a copy of the foregoing Offer of Judgment was served on the following individual by United States first class mail, postage prepaid:

Richard N. Bell
10042 Springstone Road
McCordsville, Indiana 46055

LAW OFFICE OF JOHN NELSON

BY: 
JOHN W. NELSON, ESQUIRE
Attorney No. 22228-49
Attorney for the Taylor Defendants
Email: jwnelso1@yahoo.com